

FILED IN OPEN COURT  
DATE 03-17-16  
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DIVISION, W.D. of VA

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

UNITED STATES OF AMERICA :  
 :  
v. : Case No. 7:15CR00064  
 :  
HASSAN RASOOL WILLIAMS :

**AGREED STATEMENT OF FACTS**

From March, 2013 through July, 2015, Mr. Williams ran an organization that brought New Jersey heroin into the City of Roanoke in the Western District of Virginia, where it was resold, either by co-conspirators, or by Williams himself.

Williams was assisted in the heroin business by Duane Andrews. Andrews sold heroin for Williams, collected money for Williams, helped obtain heroin in New Jersey, and generally assisted Williams in managing the lower-level workers in the organization.

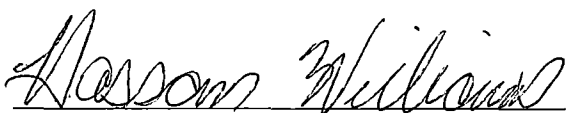
Williams and Andrews had a number of subordinate dealers; persons who resold Williams' heroin at his direction and returned the profits to him. Among these would be co-defendants Gibson, Harris, and Ward.

Police conducted two controlled purchases of heroin directly from Mr. Williams. In the second controlled purchase, Williams took money from the informant for heroin, and shortly thereafter the heroin was delivered by co-defendant Harris. In yet another controlled buy, police used an informant to buy heroin from Andrews, but as part of the transaction also gave Andrews money to repay a drug debt owed to Williams. Andrews readily accepted this money and indicated that the money would be given to Williams. Williams confirmed that he had received the money.

As part of the investigation, police also developed six sources of information, all of whom had direct and personal knowledge of Williams' activities, and knew that Williams and Andrews worked closely together and managed subordinate dealers. These individuals would be available to testify if needed.

Taking into account all available information, the evidence is that Mr. Williams was responsible for distributing more than 1,000 grams of heroin over the course of the conspiracy.

**I agree that this is a correct statement of the facts that the United States would have been able to prove, had this matter gone to trial.**



Hassan R. Williams  
Defendant



David Damico, Esq.  
Counsel for Defendant



Assistant United States Attorney